

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

TINA BLANKENSHIP, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:14-cv-26529
)	
WAL-MART STORES, INC., et al.,)	
)	
Defendants.)	

**NOTICE TO TAKE VIDEO DEPOSITION
AND REQUEST FOR PRODUCTION OF DOCUMENTS**

The said Defendants and their attorneys of record, take notice that on the **26th** date of **August, 2015 at 9:00 o'clock a.m.**, the attorney for the Plaintiffs will take the Video Deposition of Richard L. Stern, to be used as evidence in the Trial of the above cause, at **Latham & Watkins, LLP**, located at 330 North Walbash Avenue, Suite 2800, in Chicago, Illinois, who shall appear and testify and produce the documents herein requested, pursuant to the Federal Rules of Civil Procedure. The deposition shall continue from day to day until completed, unless otherwise agreed. The testimony shall be taken before a person authorized by law to administer oaths and will be recorded by sound-and-visual and stenographic means. You are invited to attend and interrogate if you so desire.

**THIS DEPONENT IS REQUESTED TO BRING WITH HIM ALL OF THE
FOLLOWING:**

1. The complete file maintained by you regarding this litigation and/or Tina Blankenship.
2. A copy of all notes, memoranda, e-mail, faxes, computer notes and correspondence prepared by you or on your behalf in connection with your involvement

in this case from the date of original filing, including your investigation and preparation of any opinions you have pertaining to this case.

3. A copy of all notes, memoranda, e-mail, faxes, correspondence and computer documents received by you to assist you in connection with your investigation of this case and the formulation of your opinions.

4. Any exhibits which you plan to use if you are called to testify at trial.

5. Any documents or publication referred to or relied upon by you in preparation of your testimony and/or opinions.

6. A list of all authorities and publications upon which you rely, in whole or in part, in formulating your opinion or testimony.

7. An updated copy of your curriculum vitae.

8. Any and all invoices which reflect your time spent and hourly rate charged in connection with your investigation of this case and the formulation of your opinions.

TINA BLANKENSHIP, et al.,

By Counsel

/s/ Michael Carr
Michael Carr, Esquire (OBA #22520)
Carr and Carr Attorneys at Law
4416 South Harvard Ave
Tulsa, OK 74135
918-747-1000 (phone)
918-747-7284 (fax)

-and-

/s/ Troy N. Giatras
Troy N. Giatras, Esquire (WVSB# 5602)
The Giatras Law Firm, PLLC
118 Capitol Street, Suite 400
Charleston, West Virginia 25301
(304) 343-2900
Counsel for Plaintiffs

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
AT CHARLESTON**

TINA BLANKENSHIP, et al.,)	
)	
Plaintiffs,)	
)	
v.)	Case No. 2:14-cv-26529
)	
WAL-MART STORES, INC., et al.,)	
)	
Defendants.)	

CERTIFICATE OF SERVICE

I, Troy N. Giatras, Esquire, counsel for Plaintiffs, do hereby certify that on August 17, 2015, I electronically filed the foregoing "*Notice to Take Video Deposition and Request for Production of Documents*" with the Clerk of the Court using CM/ECF system which will send notification of such filing to the following CM/ECF participants:

Heather M. Noel, Esquire
MacCorkle Lavender PLLC
2004 White Willow Way
Morgantown, WV 26505
Counsel for Wal-Mart Stores, Inc.

Philip J. Combs, Esquire
Aaron N. Arthur, Esquire
Thomas Combs & Spann, PLLC
300 Summers Street, Suite 1380
P.O. Box 3824
Charleston, WV 25338
Counsel for General Electric Company

/s/ Troy N. Giatras
Troy N. Giatras, Esquire (WVSB# 5602)
The Giatras Law Firm, PLLC
118 Capitol Street, Suite 400
Charleston, West Virginia 25301
(304) 343-2900
Counsel for Plaintiffs

Michael Carr, Esquire (OBA #22520)
Carr & Carr, Attorneys At Law
4416 South Harvard Avenue
Tulsa, OK 74135
(918) 747-1000
Counsel for Plaintiffs